

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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**LOREN OWENS,**

Plaintiff,

Case No. 1:25-CV-00321

Hon. Jane M. Beckering

v

**Port City Associates Group Corporation,**

City2shore Real Estate Inc., Steve Frody,  
Shelley Frody, Kellen Keck, Emmersyn Sheak,  
and John Does 1-10

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**PLAINTIFF'S *EX PARTE* MOTION AS TO DOES 1-10  
FOR LEAVE TO SERVE A THIRD-PARTY SUBPOENA  
PRIOR TO A RULE 26(F) CONFERENCE**

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Pursuant to Fed. R. Civ. P. 26(d)(1), Plaintiff Loren J. Owens ("Plaintiff"), and upon the attached Memorandum of Points and Authorities in support of this motion. Plaintiff respectfully moves for entry of an order granting her leave to serve third-party subpoena prior to a Rule 26(f) conference (the "Motion").

Dated: March 29, 2024

Respectfully submitted,  
By: /s/ Joshua S. Goodrich, J.D., LL.M.  
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*Attorneys for Plaintiff, Loren J. Owens*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on the 29th day of March 2025, a copy of the foregoing PLAINTIFF'S *EX PARTE* MOTION AS TO DOES 1-10 FOR LEAVE TO SERVE A THIRD-PARTY SUBPOENA PRIOR TO A RULE 26(F) CONFERENCE was filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all attorneys of record.

By: /s/ Joshua S. Goodrich, J.D., LL.M.  
JOSHUA S. GOODRICH, J.D., LL.M.